

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
on behalf of themselves and
others similarly situated,

CIVIL ACTION NO: 14-cv-0029

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
Successor-in-interest to
NFL Properties, Inc.,

Defendants.

**NOTICE OF FILING VERIFICATION OF NON-OWNERSHIP, NON-MANAGEMENT
AND DISSOLUTION OF COMPANIES REFERENCED IN MOTION TO COMPEL
AND DISCOVERY DIRECTED TO RESPONDENTS TIMOTHY HOWARD, J.D.,
PH.D., AND HOWARD & ASSOCIATES, P.A., AND DECLARATION OF TIMOTHY
HOWARD, J.D., PH.D.**

Pursuant to the Court's Order dated July 19, 2017 (ECF No. 8037), the August 10, 2017 Interrogatories Directed to Respondent, Timothy Howard, J.D., Ph.D., and Howard & Associates, P.A., and the September 12, 2017 Motion to Compel, the Respondents provide the following Notice of Filing Verification of Non-Ownership, Non-Management and Dissolution of Companies Referenced in Motion to Compel and Discovery Directed to Respondents Timothy Howard, J.D., Ph.D., and Howard & Associates, P.A., and Declaration of Timothy Howard, J.D., Ph.D.:

1. In order to more fully inform both the Court and Class Counsel verifying the lack of ownership, control or management of any Cambridge company, attached as

Cumulative Exhibit A, please find the State of Florida, Department of State, Dissolution Certificates dated May 3, 2017. These were filed pursuant to a sale of the Cambridge companies earlier in the year.

2. Undersigned has reached out to Class Counsel to address and resolve both discovery issue and any corrective declarations that maybe considered, and will meet and/or consult with Class Counsel after the Tuesday hearing.
3. The Declaration, attached as Exhibit B, verifies the lack of ownership, control or management of Cambridge Capital companies, and the efforts to resolve both discovery and any corrective declarations needed with Class Counsel.

Dated: September 15, 2017

Respectfully submitted,

/s/Tim Howard

Tim Howard, J.D., Ph.D

Florida Bar No.: 655325

HOWARD & ASSOCIATES, P.A.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy off the foregoing has been provided via U.S. Mail to Christopher A. Seeger, Seeger Weiss LLP, 77 Water Street, New York, NY, 10005, and by Electronic Mail to tbenedetto@seegerweis.com on this 15th day of September, 2017.

/s/Tim Howard

Tim Howard, Esq.

Cumulative Exhibit A

State of Florida

Department of State

I certify from the records of this office that CAMBRIDGE CAPITAL GROUP LLC was a limited liability company organized under the laws of the State of Florida, filed on December 4, 2015, effective January 1, 2016.

The document number of this limited liability company is L15000203070.

I further certify that said limited liability company was voluntarily dissolved on May 2, 2017, effective May 3, 2017.

*Given under my hand and the Great Seal of
Florida, at Tallahassee, the Capital, this the Fifth
day of May, 2017*

Ken Detjen

Secretary of State



Authentication ID: 800298768208-050517-L15000203070

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<https://efile.sunbiz.org/certauthver.html>

State of Florida

Department of State

I certify from the records of this office that CAMBRIDGE CAPITAL ADVISORS LLC was a limited liability company organized under the laws of the State of Florida, filed on March 5, 2015, effective March 2, 2015.

The document number of this limited liability company is L15000040994.

I further certify that said limited liability company was voluntarily dissolved on May 2, 2017, effective May 3, 2017.

*Given under my hand and the Great Seal of
Florida, at Tallahassee, the Capital, this the Fifth
day of May, 2017*

Ken DeFries

Secretary of State



Authentication ID: 000298768770-050517-L15000040994

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<https://efile.sunbiz.org/certauthver.html>

Exhibit B

DECLARATION OF PHILLIP TIMOTHY (TIM) HOWARD

STATE OF FLORIDA
COUNTY OF LEON

BEFORE ME the undersigned authority, Affiant, TIM HOWARD, being duly sworn, deposes under penalty of perjury and for use in a contested criminal trial of the factual statements made herein, swears that the following are true and accurate statements based on his personal knowledge and direct involvement with the facts and circumstances described herein:

1. My name is PHILLIP TIMOTHY (TIM) HOWARD and I am a resident of Leon County, Florida. I was born on March 7, 1961. I have personal knowledge of the facts herein and if called as a witness would testify to the statements herein. I have no disabilities and can testify to the facts set forth below.
2. I am the sole owner and president of Howard & Associates, Attorneys at Law, P.A., (Howard & Associates) and have been the sole owner and president of Howard & Associates since February 22, 1995. I submit this Declaration in response to Class Counsel's Discovery requests and Motion to Compel.
3. On August 10, 2017 Declarant received Interrogatories Directed to Respondent, Timothy Howard, J.D., Ph.D., and Howard & Associates, P.A., which were responded to on August 25, 2017, and on September 12, 2017, Class Counsel submitted a Motion to Compel, which was factually responded to on September 13, 2017, with Memorandum of Law to be filed next week.
4. In order to more fully inform Class Counsel, undersigned has provided the Dissolution of the Companies at issue, which took place on May 3, 2017, long before this matter arose, as a result of selling these companies to another group several months prior to May 3, 2017.
5. Undersigned has no ownership, control or management of the Cambridge Capital companies. Undersigned is solely one of approximately 20 investors into Cambridge Capital companies.
6. Cambridge Capital companies have their own management and owner, with Mr. Addys Walker as the managing partner, and independent counsel for the Cambridge Companies, Martin Black, Esq., that is representing Cambridge Capital companies, and that company and their counsel will be representing and responding on behalf of Cambridge Capital companies.
7. Undersigned has reached out to Class Counsel to address both the discovery issues and any corrective disclosures that maybe needed, and plan to meet and/or confer after the hearing on September 19, 2017.
8. Undersigned contingency fees for retired NFL Players generally range from 12.5% to 20%, plus costs, with some referral fees with other law firms at 25%, plus costs.
9. Many of the retired NFL Player clients have chosen, against advice of counsel, to receive advances on their claims from companies, such as Fast Track, Preferred Capital Funding, Esquire Bank, Universal Funding, RGC Funding, LLC, etc., and were not encouraged to participate with Cambridge Capital, a new and small investment company.
10. Out of approximately 2,300 clients, approximately 1% have any involvement with Cambridge Capital companies, and if a client so chooses to be involved with Cambridge Capital companies, a Notice of Express Waiver and Conflicts Disclosure was provided and executed by the client.
11. I declare that to the best of my knowledge and belief that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NAUGHT

Executed on this 15th day of Sept., 2017,By *Phillip Timothy Howard*
PHILLIP TIMOTHY (TIM) HOWARDSWORN TO AND SUBSCRIBED BEFORE ME THIS 15th DAY OF Sept., 2017, BYPERSONALY KNOWN ☒ OR IDENTIFICATION _____,

TYPE OF IDENTIFICATION PRODUCED _____

Brenda J. Murphy